

WORK ASSIGNMENT NO. 1-03
Technical/Regulatory Support for Subpart W of NESHAPS
WAM: Rosnick

PURPOSE AND SCOPE

Under this Work Assignment (WA), SC&A will provide technical and regulatory support to the EPA Office of Radiation and Indoor Air to develop a potential rulemaking to update the NESHAP Subpart W standard for radon emissions from operating uranium mill tailings impoundments which was promulgated on December 15, 1989 (40 CFR 61.250). Subpart W includes two separate standards. First, existing sources must ensure emissions from tailings impoundments do not exceed 20 pCi/m²-sec of radon-222. Second, new sources must comply with the requirements for constructing one of two types of impoundment structures. Subpart W requires that existing sources file an annual report of the facilities' emissions. These sites include the mills regulated by the NRC and its Agreement States.

Section 112(q) of the Clean Air Act, as amended, further requires EPA to review, and if appropriate, revise or update the Subpart W standard on a timely basis (10-year interval). To date, EPA has not revisited this standard since its promulgation and now desires to do so. The purpose of this Work Assignment is to provide follow-on contractor support for the development of a draft Background Information Document (BID) to support EPA's rulemaking efforts to determine if modification of Subpart W is warranted.

TECHNICAL STATUS

Progress Made During Period:

SC&A continued its efforts on the development of portions of the BID/EIA document in accordance to the outline for a joint document agreed to with EPA in earlier WAM communications.

There are some open expressed concerns regarding the accuracy of the risk model (CAP88) used for the effort, and that was earlier expressed to the WAM. The Task Leader will discuss the significance of this with the WAM. The WAM, after discussions with the EPA's Office of General Counsel, has directed that further review of the Subpart W standard should be based on consideration of generally accepted control technology (GACT), rather than a risk-based approach.

SC&A previously requested that the WAM consider adding hours to enable completion of the BID portion of the Subpart W review project in a timely manner in coordination with WA 1-09, to do an equivalent EIA for Subpart W. The related WA 1-09 has been approved and the EPA WAMs for both tasks have agreed that the construction of a joint BID/EIA document would suffice to complete both tasks. The final approval of Task 1-09 on February 24th has enabled SC&A to increase efforts on both the technology and economic impacts to be included in the content of the draft BID/EIA document.

SC&A completed and submitted a final draft BID/EIA document on March 25th in advance of the WA performance period ending on March 26, 2011.

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Difficulties Encountered and Remedial Action Taken:

None

Anticipated Activity Next Period:

None

Schedule of Deliverables Next Period:

None

OUTSTANDING ACTIONS AWAITING CONTRACTING OFFICER AUTHORIZATION

None

WORK ASSIGNMENT NO. 1-03 (Continued)
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| OVERALL FINANCIAL INFORMATION | | | | |
|--|----------------|---------------|-------------------|---------------|
| | <u>Current</u> | | <u>Cumulative</u> | |
| | <u>Hours</u> | <u>Amount</u> | <u>Hours</u> | <u>Amount</u> |
| Amount Claimed | 1.0 | 85.06 | 342.5 | \$45,276.22 |
| Amount Shown on Work Plan | | | 362.0 | \$45,366.00 |
| Amount Paid | | | | 45,191.16 |
| Amount Suspended | | | | \$0.00 |
| Amount Disallowed | | | | \$0.00 |
| Remaining Amount | | | 19.5 | \$89.78 |
| Unbilled Allowable Costs | | \$0.00 | | \$0.00 |
| Labor Estimates for Next Period | | | 0.0 | \$0.00 |
| Estimate to Complete | | | 19.5 | \$89.78 |
| Estimated Percentage of Completion, based on LOE | | | | 95% |

| LABOR SUMMARY | | | | | | | | | |
|------------------------------------|------|----------------|--------------|-------------------|-----------------|-------------------------------|--------------|------------------|--------------|
| | | <u>Current</u> | | <u>Cumulative</u> | | <u>Negotiated (Work Plan)</u> | | <u>Remaining</u> | |
| | | <u>Hours</u> | <u>Costs</u> | <u>Hours</u> | <u>Costs</u> | <u>Hours</u> | <u>Costs</u> | <u>Hours</u> | <u>Costs</u> |
| P4 | SC&A | 0.00 | 0.00 | 325.50 | 43,025.62 | 350.00 | 43,006.00 | 24.50 | (19.62) |
| | Sub | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| P3 | SC&A | 1.00 | 85.06 | 17.00 | 1,680.16 | 12.00 | 1,088.00 | (5.00) | (592.16) |
| | Sub | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| P2 | SC&A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Sub | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| P1 | SC&A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Sub | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Technician | SC&A | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| | Sub | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Clerical | SC&A | 0.00 | 0.00 | 12.00 | 548.54 | 16.00 | 983.00 | 4.00 | 434.46 |
| | Sub | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | | 1.00 | 85.06 | 342.50 | 45,254.32 | 362.00 | 45,077.00 | 19.50 | (177.32) |
| Average Hourly Rate (Labor) | | | | | \$132.13 | \$124.52 | | | |

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| ODC DETAIL INFORMATION | | |
|-------------------------------|---------------|----------------|
| Item | Current | Cumulative |
| Publications/Subscriptions | \$0.00 | \$0.00 |
| Computer Supplies/Usage | \$0.00 | \$0.00 |
| Meetings/Travel | \$0.00 | \$0.00 |
| Supplies/Materials | \$0.00 | \$0.00 |
| Reproduction/Graphics | \$0.00 | \$1.07 |
| Telephone/Fax | \$0.00 | \$18.22 |
| Typing/Clerical | \$0.00 | \$0.00 |
| Postage/Delivery | \$0.00 | \$0.00 |
| Other | \$0.00 | \$0.00 |
| TOTAL | \$0.00 | \$19.29 |
| Sub ODCs | - | - |
| Burden on ODCs | - | \$2.61 |

| WORK HOUR DETAIL THIS PERIOD | | |
|-------------------------------------|-------------|--------------|
| | Name | Hours |
| P-4 Labor | None | - |
| P-3 Labor | M. Connelly | 1 |
| P-2 Labor | None | - |
| P-1 Labor | None | - |
| Technician Labor | None | - |
| Clerical Labor | None | - |